

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

No. 1:19-cv-08655 (LGS)(GWG)

**DEFENDANT GOOGLE LLC'S NOTICE OF
MOTION TO RETAIN DOCUMENTS UNDER SEAL**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Declaration of Sara B. Tomezsko and exhibits, Declaration of Brian Ong (ECF 146), Declaration of Kevin Lucas (ECF 148, and Declaration of Frank Wagner (ECF 147), Defendant Google LLC, through its undersigned counsel, hereby moves this Court, before the Honorable Lorna G. Schofield, at the United States District Court, 500 Pearl Street, Room 6B, New York, New York 10007, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, the Stipulated Protective Order for the Treatment of Confidential Information dated February 4, 2020 (ECF 23), and the Court's Individual Rules and Procedures for Civil Cases, Rule I.D for an Order permitting it to retain under seal certain documents or portions thereof submitted in connection with Defendant's forthcoming Reply in Further Support of its Motion for Summary Judgment and Opposition to Plaintiff's Partial Motion for Summary Judgment, dated December 24, 2021.

PLEASE TAKE FURTHER NOTICE that, Plaintiff's opposition, if any, shall be due on January 7, 2022, and Google's reply due January 14, 2022.

Dated: Jersey City, New Jersey
December 24, 2021

PAUL HASTINGS LLP


By: Kenneth W. Gage
Sara Tomezsko

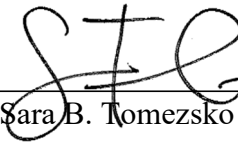
200 Park Avenue
New York, NY 10166
Tel: (212) 318-6000
Fax: (212) 319-4090
kennethgage@paulhastings.com
saratomezsko@paulhastings.com

Attorneys for Defendant
GOOGLE LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this December 24, 2021, I caused a true and exact copy of the foregoing DEFENDANT GOOGLE LLC'S NOTICE OF MOTION TO RETAIN DOCUMENTS UNDER SEAL, MEMORANDUM OF LAW, and all accompanying declarations and exhibits to be filed electronically and served by mail on anyone unable to accept electronic filing. Notice and copies of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

Dated: Jersey City, New Jersey
December 24, 2021


Sara B. Tomezsko